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HAROLD LEGGETT, PH.D.  
-SECRETARY-

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**

Certified Mail No.:

Activity No.: PER20080001  
Agency Interest No.: 96425

Mr. Michael J. Willis  
Chief Operating Officer  
Century Exploration New Orleans, Inc.  
3838 North Causeway Blvd, Ste 2800, Lakeway III  
Metairie, LA 70002

RE: Permit, Breton Sound Block 51 Production Platform, Century Exploration New Orleans, Inc.  
Boothville, Plaquemines Parish, Louisiana

Dear Mr. Willis:

This is to inform you that the permit modification request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Permit Support Services Division, at (225) 219-0075 or email your changes to [facupdate@la.gov](mailto:facupdate@la.gov).

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Permit No.: 2240-00326-01

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary

CSN:kmt

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**CENTURY EXPLORATION NEW ORLEANS INC.**  
**BRETON SOUND BLOCK 51 PRODUCTION PLATFORM**  
**PROPOSED SYNTHETIC MINOR AIR OPERATING PERMIT MODIFICATION**

The LDEQ, Office of Environmental Services, is accepting written comments on the proposed synthetic minor air operating permit modification for Century Exploration New Orleans Inc., 3838 North Causeway Blvd., Suite 2800, Lakeway III, Metairie, LA 70002 for the Breton Sound Block 51 Production Platform. **The facility is located in the Gulf of Mexico, approximately 13.5 miles northeast of Boothville, LA in Plaquemines Parish.**

Century Exploration New Orleans Inc. has requested a permit modification for the Breton Sound Block 51 Production Platform, an oil and gas production facility. The Breton Sound Block 51 Production Platform currently operates under Permit No. 2240-00326-00, issued March 4, 2002. Century Exploration New Orleans, Inc. is proposing the following modifications:

1. The addition of a vent scrubber, several gas operated pumps, blowcase vessels, pneumatic controllers, a water skimmer waste gas vent, and a WEMCO relief vent to the facility.
2. The addition of emission limits for CAP 1, which represents the combined emission totals from two generator engines (EQT006 & EQT007). The operation of these sources is alternated with a combined runtime.
3. The addition of a heater treater, line heater, and several storage tanks to the insignificant activities list.
4. Update of emission limits for the remaining emission point sources to reflect current facility conditions.

The generator engines (EQT006 & EQT007) will be limited to the combined operating hours of 11,000 hr/yr (CAP 1).

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	0.06	0.55	+0.49
SO <sub>2</sub>	-	0.03	+0.03
NO <sub>x</sub>	79.71	80.20	+0.49
CO	12.50	80.12	+67.62
VOC*	66.67	71.41	+4.74

\*VOC speciation in tons per year:

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year
2,2,4-Trimethylpentane	0.17
Benzene	0.58
Ethyl benzene	0.01
Formaldehyde	0.47
Methanol	0.07
n-Hexane	1.15
Toluene	0.38
Xylenes	0.08
Total TAP's	2.91
Other VOC's	68.50

Total VOC

71.41

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Wednesday, November 26, 2008.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application and proposed permit are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

Additional copies may be reviewed at the Plaquemines Parish Library, Belle Chase Branch, 8442 Highway 23, Belle Chase, LA 70037.

Inquiries or requests for additional information regarding this permit action should be directed to Katie Troxler, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3055.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmaillistrequest@la.gov](mailto:deqmaillistrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the proposed permit** can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm)

**All correspondence should specify AI Number 96425, Permit Number 2240-00326-01, and Activity Number PER20080001.**

**Scheduled Publication Date: October 21, 2008**

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Breton Sound Block 51 Production Platform**  
**Agency Interest No.: 96425**  
**Century Exploration New Orleans, Inc.**  
**Boothville, Plaquemines Parish, Louisiana**

**I. BACKGROUND**

Century Exploration New Orleans, Inc., Breton Sound Block 51 Production Platform, an existing oil and gas production facility, began operation in 2002. The Breton Sound Block 51 Production Platform currently operates under Permit No. 2240-00326-00, issued March 4, 2002.

**II. ORIGIN**

A permit application and Emission Inventory Questionnaire (EIQ) dated June 11, 2008 were received requesting a permit.

**III. DESCRIPTION**

The Breton Sound Block 51 Production Platform performs operations typical of an oil and gas production facility that is used to treat and handle production from various wells using two identical separation systems. Production from two of five high pressure wells is routed through a line heater to one of two high pressure separators. Production from the remaining three high pressure wells is routed directly to one of these high pressure separators. Gas from the separators is routed to a glycol contact tower for drying prior to being sent to a sales pipeline and used as facility fuel.

Liquids from the high pressure separators are routed to one of two low pressure separators. Off-gas from the low pressure separators is captured by the facility's compressor system. Oil from the low pressure separators is routed to one of two heater treaters for further separation. Water from the low pressure separators is routed to a water skimmer and WEMCO vessel before being dumped overboard. Off-gas from the water skimmer is released to the atmosphere through a vent scrubber stack. Off-gas from the WEMCO vessel is captured by a VRU system with relief gas released to the atmosphere through the vent scrubber stack. Off-gas from the heater treaters is captured by the VRU compressor system. Oil from the heater treaters is dumped to an on-site tank for storage until being pumped (via electric-powered LACT pump) into a sales pipeline.

Any water from the heater treaters is routed to the water skimmer and treated accordingly. Production from three low pressure wells is routed to one of the two low pressure separators and treated accordingly. Vapors from the glycol still column are piped through a condenser where condensed liquids are collected by a blowcase vessel and effluent vapors are captured by a VRU system with relief gas vented to atmosphere. The glycol dehydration unit is equipped with a glycol pump flash separator where effluent gas is routed to the glycol burner for fuel with relief gas captured by a VRU system. Vapors from the oil storage tanks are captured by the VRU system (with an assumed capture efficiency of 95%). Relief gas (the remaining 5%) is vented to the atmosphere. Two generators, various gas operated pumps, and insignificant storage tanks are also located at the facility.

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**Century Exploration New Orleans, Inc.**  
**Boothville, Plaquemines Parish, Louisiana**

Century Exploration New Orleans, Inc. proposes the following modifications:

1. The addition of a vent scrubber, several gas operated pumps, blowcase vessels, pneumatic controllers, a water skimmer waste gas vent, and a WEMCO relief vent to the facility.
2. The addition of emission limits for CAP 1, which represents the combined emission totals from two generator engines (EQT006 & EQT007). The operation of these sources is alternated with a combined runtime of 11,000 hr/yr.
3. The addition of a heater treater, line heater, and several storage tanks to the insignificant activities list.
4. Update of emission limits for the remaining emission point sources to reflect current facility conditions.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	0.06	0.55	+0.49
SO <sub>2</sub>	-	0.03	+0.03
NO <sub>x</sub>	79.71	80.20	+0.49
CO	12.50	80.12	+67.62
VOC *	66.67	71.41	+4.74

\*VOC speciation in tons per year:

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year
2,2,4-Trimethylpentane	0.17
Benzene	0.58
Ethyl benzene	0.01
Formaldehyde	0.47
Methanol	0.07
n-Hexane	1.15
Toluene	0.38
Xylenes	0.08
Total TAP's	2.91
Other VOC's	68.50
Total VOC	71.41

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Breton Sound Block 51 Production Platform**  
**Agency Interest No.: 96425**  
**Century Exploration New Orleans, Inc.**  
**Boothville, Plaquemines Parish, Louisiana**

**IV. TYPE OF REVIEW**

This permit was reviewed for compliance with Louisiana Air Quality Regulations. National Emission Standards for Hazardous Air Pollutants (NESHAP) does apply [40 CFR 63 Subpart HH]. New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) and do not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs).

**V. PUBLIC NOTICE**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <Date>; and in *The Enterprise & Interstate Progress*, Mansfield, on <Date>. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <Date>. All documents will be considered prior to issuance of the permit.

**VI. EFFECTS ON AMBIENT AIR**

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Ambient Air Quality Standard (NAAQS)
-	-	-	-

**VII. GENERAL CONDITION XVII ACTIVITIES**

Work Activity	Schedule	VOC Emissions (tpy)
Misc. Sampling Procedures	-	0.25
Compressor Blowdowns Associated with Regular Maintenance	4 times/month	0.50
Pump Preparation	-	0.13

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA-DEPARTMENT-OF-ENVIRONMENTAL-QUALITY**

**Breton Sound Block 51 Production Platform**  
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Line Preparation	-	0.25
Vessel Preparation	-	0.20
Filter Replacement	-	0.05
Instrumentation Mechanical Work	-	0.10
Tank Cleaning for Inspection/Service	-	0.38
Storage Tank Thief Hatch Releases	Daily	2.25

**VIII. INSIGNIFICANT ACTIVITIES**

ID No.:	Description	Citation
1	500 MBTU/hr Heater Treater-Burner Stack	LAC 33:III.501.B.5; Table A.1&A.5
2	500 MBTU/hr Heater Treater-Burner Stack	LAC 33:III.501.B.5; Table A.1&A.5
13-08-LH-BS	2.0 MMBTU/hr Line Heater-Burner Stack	LAC 33:III.501.B.5; Table A.1&A.5
23-08-LH-BS	500 MBTU/hr Line Heater-Burner Stack	LAC 33:III.501.B.5; Table A.1&A.5
25-08-CST	110 gallon Chemical Storage Tank	LAC 33:III.501.B.5.A.2
26-08-CST	3 – 200 gallon Chemical Storage Tanks	LAC 33:III.501.B.5.A.2
27-08-LOT	3 – 55 gallon Lube Oil Storage Tanks	LAC 33:III.501.B.5.A.2
28-08-CST	5 – 330 gallon Chemical Storage Tanks	LAC 33:III.501.B.5.A.3
29-08-ST	550 gallon Storage Tank	LAC 33:III.501.B.5.A.3
30-08-ST	400 gallon Sump Tank	LAC 33:III.501.B.5.A.3

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**LOUISIANA AIR EMISSION PERMIT**  
**GENERAL CONDITIONS**

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- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated June 11, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.



## LOUISIANA AIR EMISSION PERMIT

### GENERAL CONDITIONS

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
  - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33:I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
  2. Report by September 30 to cover April through June
  3. Report by December 31 to cover July through September
  4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
  2. Cause of noncompliance;
  3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

# INVENTORIES

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

## Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
<b>Breton Sound Block 51 Production Platform</b>							
EQT0009	9 - Glycol Regenerator-Still Column Condenser	.1	.2	.2		10	80
EQT0010	11 - Gas Operated Pump (Wilden M8)	905	154	.06		2	70
EQT0014	14-08-VS - Vent Scrubber	.2	2.6	.5		50	70
EQT0015	15-08-GOP - Gas Operated Pump (Wilden M4)	454	77	.06		2	70
EQT0016	16-08-GOP - Gas Operated Pump (Wilden M4)	454	77	.06		2	70
EQT0017	17-08-GOP - Gas Operated Pump (Wilden M4)	454	77	.06		2	70
EQT0018	18-08-GOP - Gas Operated Pump (Wilden M4)	454	77	.06		2	70
EQT0019	19-08-BV - Blowcase Vessel (Condensed Liquids)	5	.1	.02		2	70
EQT0020	20-08-BV - Blowcase Vessel (Compressor Skid Fluids)	53	1	.02		2	70
EQT0021	21-08-PC - Pneumatic Controllers						70
FUG0001	10 - Fugitive Emissions						70
PCS0001	CAP 1 - Internal Combustion Engines (Alternating Operating Hours 11,000 hr/yr)						

## Relationships:

ID	Description	Relationship	ID	Description
EQT0004	4 - Oil Storage Tank-Common Vent	Controlled by, 95%	EQT0012	VRU - Electric Vapor Recovery Unit
EQT0005	5 - Oil Storage Tank-Common Vent (Bad Oil)	Controlled by, 95%	EQT0012	VRU - Electric Vapor Recovery Unit
EQT0009	9 - Glycol Regenerator-Still Column Condenser	Controlled by, 95%	EQT0012	VRU - Electric Vapor Recovery Unit
EQT0013	24-08-WEMCO-RV - WEMCO-Relief Vent	Controlled by, 95%	EQT0012	VRU - Electric Vapor Recovery Unit
EQT0013	24-08-WEMCO-RV - WEMCO-Relief Vent	Vents to, 5%	EQT0014	14-08-VS - Vent Scrubber
EQT0022	22-08-WS-WG - Water Skimmer-Waste Gas	Vents to	EQT0014	14-08-VS - Vent Scrubber

## Subject Item Groups:

ID	Group Type	Group Description
PCS0001	Process Group	CAP 1 - Internal Combustion Engines (Alternating Operating Hours 11,000 hr/yr)
UNF0001	Unit or Facility Wide	Facility - Breton Sound Block 51 Production Platform

## Group Memberships:

ID	Description	Member of Groups
EQT0006	6 - Internal Combustion Engine-Exhaust Engine (Waukesha F3521GU, Generator)	PCS00000000001
EQT0007	7 - Internal Combustion Engine-Exhaust Engine (Waukesha F3521GU, Generator)	PCS00000000001

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

**INVENTORIES**

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0040	Crude Oil and Natural Gas Production (Less than 100 T/Yr Source)	1	

**SIC Codes:**

1311	Crude petroleum and natural gas	A96425
1311	Crude petroleum and natural gas	UNF001

# EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
<b>CAP 1 - Internal Combustion Engines (Alternating Operating Hours 11,000 hr/yr)</b>															
EQT 0006 6		19.76			19.76			0.05			0.00			0.33	
EQT 0007 7		19.76			19.76			0.05			0.00			0.33	
<b>Breton Sound Block 51 Production Platform</b>															
EQT 0003 3	0.10	0.10	0.43	0.12	0.12	0.51	0.01	0.01	0.04				0.01	0.01	0.03
EQT 0004 4													6.60	6.60	28.93
EQT 0005 5													0.01	0.01	0.05
EQT 0008 8	3.31	4.13	14.49	3.31	4.13	14.49	0.06	0.06	0.24	0.00	0.00	0.01	0.29	0.36	1.27
EQT 0009 9													0.18	0.18	0.77
EQT 0010 10													34.87	34.87	12.21
EQT 0014 14-08-V/S													0.53	0.53	2.31
EQT 0015 15-08-GOP													17.44	17.44	1.74
EQT 0016 16-08-GOP													17.44	17.44	1.74
EQT 0017 17-08-GOP													17.44	17.44	0.87
EQT 0018 18-08-GOP													17.44	17.44	0.87
EQT 0019 19-08-BV													0.02	0.03	0.08
EQT 0020 20-08-BV													0.01	0.26	0.06
EQT 0021 21-08-PC													3.76	3.76	16.46
FUG 0001 10													0.59	0.59	2.59
PCS 0001 CAP 1	14.89		65.20	14.89		65.20	0.06		0.27	0.01		0.02	0.33		1.43

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0003 3	n-Hexane			0.01
EQT 0004 4	2,2,4-Trimethylpentane			0.02
	Benzene			0.01
	n-Hexane	0.12	0.12	0.51
EQT 0006 6	Benzene		0.02	
	Formaldehyde		0.05	
	Methanol		0.01	
	Toluene		0.01	
EQT 0007 7	Benzene		0.02	
	Formaldehyde		0.05	
	Methanol		0.01	
	Toluene		0.01	
EQT 0008 8	Benzene	0.02	0.02	0.11
	Formaldehyde	0.05	0.05	0.20
	Methanol	0.01	0.01	0.03
	Toluene	0.01	0.01	0.03
	Xylene (mixed isomers)			0.01
EQT 0009 9	2,2,4-Trimethylpentane			0.00
	Benzene	0.04	0.04	0.20
	Ethyl benzene			0.01
	Toluene	0.04	0.04	0.17
	Xylene (mixed isomers)	0.01	0.01	0.03
	n-Hexane			0.02
EQT 0010 11	2,2,4-Trimethylpentane	0.14	0.14	0.05
	Benzene	0.12	0.12	0.04
	Ethyl benzene	0.01	0.01	0.00
	Toluene	0.12	0.12	0.04
	Xylene (mixed isomers)	0.04	0.04	0.01
	n-Hexane	0.58	0.58	0.20
EQT 0014 14-08 VS	2,2,4-Trimethylpentane			0.01
	Benzene			0.01
	Toluene			0.01
	n-Hexane	0.01	0.01	0.04
EQT 0015 15-08 GOP	2,2,4-Trimethylpentane	0.07	0.07	0.01

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0015 15-08-GOP	Benzene	0.06	0.06	0.01
	Toluene	0.06	0.06	0.01
	Xylene (mixed isomers)	0.02	0.02	0.00
	n-Hexane	0.29	0.29	0.03
EQT 0016 16-08-GOP	2,2,4-Trimethylpentane	0.07	0.07	0.01
	Benzene	0.06	0.06	0.01
	Toluene	0.06	0.06	0.01
	Xylene (mixed isomers)	0.02	0.02	0.00
	n-Hexane	0.29	0.29	0.03
EQT 0017 17-08-GOP	2,2,4-Trimethylpentane	0.07	0.07	0.00
	Benzene	0.06	0.06	0.00
	Toluene	0.06	0.06	0.00
	Xylene (mixed isomers)	0.02	0.02	0.00
	n-Hexane	0.29	0.29	0.01
EQT 0018 18-08-GOP	2,2,4-Trimethylpentane	0.07	0.07	0.00
	Benzene	0.06	0.06	0.00
	Toluene	0.06	0.06	0.00
	Xylene (mixed isomers)	0.02	0.02	0.00
	n-Hexane	0.29	0.29	0.01
EQT 0021 21-08-PC	2,2,4-Trimethylpentane	0.02	0.02	0.07
	Benzene	0.01	0.01	0.06
	Toluene	0.01	0.01	0.06
	Xylene (mixed isomers)	0.00	0.00	0.02
	n-Hexane	0.06	0.06	0.27
FUG 0001 10	2,2,4-Trimethylpentane			0.01
	Benzene			0.01
	Toluene			0.01
	n-Hexane			0.02
PCS 0001 CAP 1	Benzene	0.03		0.12
	Formaldehyde	0.06		0.27
	Methanol	0.01		0.04
	Toluene	0.01		0.04
	Xylene (mixed isomers)	0.00		0.01
UNF 0001 Facility	2,2,4-Trimethylpentane			0.17

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0001 Facility	Benzene			0.58
	Ethyl benzene			0.01
	Formaldehyde			0.47
	Methanol			0.07
	Toluene			0.38
	Xylene (mixed isomers)			0.08
	n-Hexane			1.15

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.



**SPECIFIC REQUIREMENTS**

AI ID: 96425 - Breton Sound Block 51 Production Platform

Activity Number: PER20080001

Permit Number: 2240-00326-01

Air - Minor (Synthetic) Modification

**Group: PCS0001 CAP 1 - Internal Combustion Engines (Alternating Operating Hours 11,000 hr/yr)****PCS0001 CAP 1 - Internal Combustion Engines (Alternating Operating Hours 11,000 hr/yr)**

Group Members: EQT0006 EQT0007

- 1 [LAC 33:III.1101.B] Opacity  $\leq$  20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  
Which Months: All Year Statistical Basis: None specified
- 2 [LAC 33:III.1311.C] Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  
Which Months: All Year Statistical Basis: Six-minute average  
Operating time  $\leq$  11,000 hr/yr.  
Which Months: All Year Phases: Statistical Basis:  
Operating time: Operating time recordkeeping by electronic or hard copy annually. Keep records of the total hours of operation.
- 3 [LAC 33:III.501.C.6]
- 4 [LAC 33:III.501.C.6]

**EQT0003 3 - Glycol Regenerator-Burner Stack**

- 5 [LAC 33:III.1101.B] Opacity  $\leq$  20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  
Which Months: All Year Statistical Basis: None specified  
Total suspended particulate  $\leq$  0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel.).  
Which Months: All Year Statistical Basis: None specified
- 6 [LAC 33:III.1313.C]

**EQT0004 4 - Oil Storage Tank-Common Vent**

- 7 [LAC 33:III.2103.G] LAC 33:III.2103: EXEMPT.

**EQT0005 5 - Oil Storage Tank-Common Vent (Bad Oil)**

- 8 [LAC 33:III.2103.G] LAC 33:III.2103: EXEMPT.

**EQT0008 8 - Internal Combustion Engine-Exhaust Engine (Caterpillar G398NA-HCR/Cat Converter; LP Gas Compressor)**

- 9 [LAC 33:III.1101.B] Opacity  $\leq$  20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  
Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS****AI ID: 96425 - Breton Sound Block 51 Production Platform****Activity Number: PER20080001****Permit Number: 2240-00326-01****Air - Minor (Synthetic) Modification****EQT0008 8 - Internal Combustion Engine-Exhaust Engine (Caterpillar G398NA-HCR/Cat Converter; LP Gas Compressor)**

10 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel.)

Which Months: All Year Statistical Basis: Six-minute average

11 [LAC 33:III.501.C.6] Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of maximum permitted capacity. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NOx, CO, O2, SO2 and VOC concentrations in the stack gas obtained during annual testing.

12 [LAC 33:III.501.C.6] Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.

13 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified  
Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.

14 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified  
Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O2 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.

15 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified  
Stack gas concentration: Ozone monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O3 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.

16 [LAC 33:III.501.C.6] Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

17 [LAC 33:III.501.C.6] Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO2 / ton, 100% H2SO4, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H2SO4 was being produced) Units tested at less than 95% of permitted maximum capacity shall provide documentation to support compliance at 100% of the permitted maximum capacity.

**EQT0009 9 - Glycol Regenerator-Still Column Condenser**

18 [40 CFR 63.774(d)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep records of the information specified in 40 CFR 63.774(d)(1)(i) or (d)(1)(ii), as applicable. Subpart HH, [40 CFR 63.774(d)]

**SPECIFIC REQUIREMENTS****AI ID: 96425 - Breton Sound Block 51 Production Platform****Activity Number: PER20080001****Permit Number: 2240-00326-01****Air - Minor (Synthetic) Modification****EQT0009 9 - Glycol Regenerator-Still Column Condenser**

- 19 [LAC 33:III.2116.B.2] VOC, Total  $\geq$  85 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D. Which Months: All Year Statistical Basis: None specified
- 20 [LAC 33:III.2116.D] Determine compliance with LAC 33:III.2116.B using the methods in LAC 33:III.2116.D.1-5, as appropriate.

**FUG0001 10 - Fugitive Emissions**

- 21 [LAC 33:III.2111] Equip all rotary pumps and compressors with mechanical seals.

**UNF0001 Breton Sound Block 51 Production Platform**

- 22 [40 CFR 63] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 2 of 40 CFR 63 Subpart HH.
- 23 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 24 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 25 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 26 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 27 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 28 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency. Due within 30 days after requested by the administrative authority.
- 29 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.

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June 11, 2008

PER 20080001

Louisiana Department of Environmental Quality  
Office of Environmental Services  
Permits Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
Attn.: Cheryl Nolan

**RE: Application for Air Permit Modification  
Century Exploration New Orleans, Inc.  
Breton Sound Block 51 Production Platform  
Permit No.: 2240-00326-00; AI No.: 96425  
Plaquemines Parish, LA**

On behalf of Century Exploration New Orleans, Inc. (Century) and in accordance with LAC 33:III.5, submitted with this are one bound and two clipped sets of the referenced material. A \$90 check is included for the review fee associated with fee number 0040. Request is hereby made for a modification of State operating permit number 2240-00326-00.

The facility functions as a typical oil & gas production site. This action requests that various changes to the current permit be incorporated as presented in the accompanying application. Details of these changes, emission estimates and associated emission programs are included herein and verify that the facility should continue to be classified as a minor source under the State and Federal air permitting programs. All measures should be taken in the review process to assure that the minor source classification remains federally-recognized.

Please note that the generator engines and gas compressor engine at this facility are not subject to the requirements of 40 CFR Part 60-Subpart JJJJ as they were not manufactured on or after July 1, 2008 and July 1, 2007, respectively or modified or reconstructed after June 12, 2006.

If any other information is required regarding these matters, please do not hesitate to contact me at (337) 839-1075. All written correspondence should be directed to: **Century Exploration New Orleans, Inc., 3838 North Causeway Blvd., Suite 2800, Lakeway III, Metairie, LA, 70002, Attn.: Donna Mills.** Thank-you in advance for your assistance with this matter.

Sincerely,  
HLP ENGINEERING, INC.

*Stormy B. Mandella*

Stormy B. Mandella

Encl.

xc: Donna Mills - Century

2008 JUN 13 PM 2:13  
LDEQ - OES